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December 31, 2014

VIA ECF

Honorable Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: American Stevedoring, Inc. v. International Longshoremen's Ass'n, AFL-CIO
Civil Action No.: 1:13-CV-00918 (KPF)

Dear Judge Failla:

We write in connection with the Court's September 19, 2014 Order (Docket # 99), which stayed this matter and referred it to mediation with Mediator Daniel F. Kolb, Esq. We are happy to report that the parties have reached a settlement in principle and are in the process of completing the necessary agreements in order to finalize the agreed-upon settlement. The year-end holidays have slowed down the process because of the absence of some of the parties on holiday excursions. All parties to the mediation are in agreement that the mediation deadline should be extended until January 16, 2015, in order for the final settlement agreements to be completed and executed. We respectfully request that the Court consider and grant this short extension of time.

Respectfully submitted,

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Honorable Katherine Polk Failla

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December 31, 2014

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